

# Policy statement concerning the German Supply Chain Due Diligence Act (LkSG)

## 1. Introduction

The winkler Unternehmensgruppe is aware of its responsibility to respect and promote human rights and environmental standards along the entire supply chain. This policy statement describes our commitment and the measures we are taking to meet our due diligence obligations in accordance with the German Supply Chain Due Diligence Act (LkSG).

## 2. Company profile

The winkler Unternehmensgruppe – the technical trade and equipment supplier for all aspects of commercial vehicles, workshops and agriculture – is represented throughout Europe with approximately 1,600 employees at 40 locations. With our broad network of suppliers and partners, we are in a position to offer our customers high-quality products and services.

## 3. Commitment to respecting human rights and environmental standards

We pledge to respect and promote human rights and environmental standards in all our business activities. In particular, this includes:

- The avoidance of child labor and forced labor
- Ensuring safe and healthy working conditions
- Protecting the environment through sustainable practices

We are aware of our corporate responsibility to respect human rights. We are therefore committed to respecting human rights in our own business activities and in our global supply and value chains and to enabling those affected by human rights violations to have access to help. In doing so, we are aligning our business activities with the internationally recognized United Nations Guiding Principles on Business and Human Rights and thus implementing the requirements of the National Action Plan for Business and Human Rights.

Furthermore, our understanding and our human rights due diligence processes are based on the following international human rights reference instruments to which we are committed: The International Bill of Human Rights, i.e. the United Nations Universal Declaration of Human Rights, as well as the International Covenant on Civil and Political Rights, which define civil, political and social rights to which all people are entitled for the sake of their dignity.

The core labor standards of the International Labor Organization (ILO) with their four basic principles on freedom of association and the right to collective bargaining, the elimination of forced labor and child labor, and the prohibition of discrimination in respect of employment and occupation.

We expect our business partners also to commit to respecting human rights, to establishing appropriate due diligence processes and to passing these expectations on to their own suppliers.

#### **4. Risk management and preventive measures**

To ensure that we fulfill our due diligence obligations, we have implemented a comprehensive risk management system that includes the following elements:

##### **Risk management**

Our risk management system is based on clearly defined responsibilities within the organization. Our processes are designed to identify new risks proactively. We place great value in regular communication between the responsible department and the relevant internal stakeholders.

Our human rights officer regularly reports to the managing directors of the winkler Unternehmensgruppe on risks and developments. This ensures continuous monitoring. We properly document all measures that serve to protect human rights and the environment and are committed to complying with all applicable reporting obligations.

By implementing this comprehensive approach, the winkler Unternehmensgruppe prevents negative impacts on human rights and the environment.

##### **Risk analysis**

Within the winkler Unternehmensgruppe, a detailed risk analysis is carried out at least once a year and, if necessary, on an ad hoc basis. In this way, potential risks are identified and prioritized accordingly. We are guided in this process by legal criteria in order to prioritize appropriately. The risk assessment and analysis is carried out with the support of the purchasing department, which has the necessary expertise in its area of responsibility.

Our risk analysis includes both abstract and concrete assessments. Abstract risk analyses use advanced sustainability risk scores based on criteria such as the country, product or material, impact potential and causal contribution. Specific risk analyses include sending out intelligent questionnaires for supplier self-assessment.

The results of the analysis of human rights risks and impacts are incorporated into our corporate decision-making processes with regard to supplier selection, business partner management, product responsibility and product development. The risk analysis forms the basis for identifying appropriate measures.

##### **Preventive measures**

In addition, we rely on preventive and remedial measures based on the results of the risk analyses. These measures are continuously monitored and adjusted to ensure that they comply with the legal requirements.

#### **5. Remedial measures and grievance mechanism**

Should any violations of our standards be identified, we will promptly take remedial measures. We have also set up a grievance mechanism that enables employees, suppliers and other stakeholders to report violations anonymously. We ensure that all incoming grievances are treated confidentially and investigated thoroughly. Our grievance mechanism is designed to provide a safe and trustworthy platform for reporting violations without the reporting person having to fear reprisals. In this way, we promote a culture of transparency and accountability within our company and along our supply chain.

## **6. Documentation and reporting**

We document all measures and progress within the scope of our due diligence obligations and report on them regularly. These reports are made publicly available on our website to ensure transparency.

## **7. Expectations of our suppliers**

We expect our suppliers to share our standards and values and actively to contribute to compliance with human rights and environmental standards.

## **8. Closing remark**

The winkler Unternehmensgruppe is determined to live up to its responsibility and make a positive contribution to respecting human rights and protecting the environment. We will continuously review and improve our efforts to meet the requirements of the German Supply Chain Due Diligence Act.

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